



May 16, 2005

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notice – WC Docket No. 04-36

Dear Ms. Dortch:

On May 12, 2005, the undersigned and Ray Paddock, Vice President of Industry Relations, both of Intrado Inc. (“Intrado”), met with FCC Commissioners and staff to discuss the Commission’s decision to address the enhanced 9-1-1 capabilities of VoIP services. Intrado representatives met with Michelle Carey, Wireline Competition Advisor to Chairman Martin; Tom Navin, Wireline Bureau Chief; Julie Veach, Acting Deputy Chief Competition Policy Division, Pam Arluck, Legal Advisor to Wireline Bureau Chief; Christi Shewman, and Nicholas Alexander, all of the Wireline Competition Bureau; Commissioner Adelstein and Senior Legal Advisor Barry Ohlson; Commissioner Copps and Jessica Rosenworcel, Legal Advisor to Commissioner Copps.

In each of these meetings, we discussed the following key points:

Appreciation of Commission’s Work:

We sincerely appreciate the hard work the Commission and staff have put into addressing E9-1-1 for VoIP subscribers. The Commission should be commended for the urgency they have shown toward the critical issue.

While the path forward will be challenging and not without risk, Intrado is ready to act quickly to assist the VoIP Service Providers meet the requirements of the order. This statement is dependent on full cooperation by all parties as explained below.

10-Digit Solution:

We share the Commission's view that the current use of 10-digit, 24x7 emergency numbers at the Public Safety Answering Point (PSAP) should be eliminated as soon as possible. However, even with the schedule the Commission is considering, large parts of the country will continue to be dependent on this solution until native delivery of E9-1-1 calling can be implemented. We strongly recommend that the Commission communicate its support for the need of an interim 10-digit solution and set aggressive timelines for migrating from the interim solution to the native E9-1-1 network. With a commitment to move to native delivery of E9-1-1 calls in place, PSAPs should be encouraged to take calls on their 10-digit emergency lines until the native solution is deployed in their respective area or in extraordinary situations after deployment of the native network.

Cooperation by all Parties:

Cooperation by the E9-1-1 Service Providers, VoIP Service Providers, PSAPs and the telecommunications industry is critical. With this cooperation, PSAPs would be able to receive emergency calls natively over their existing 9-1-1 trunks and would receive location and callback information using their current ALI systems and steering capabilities. Standardized deployment of native VoIP 9-1-1 call delivery would require some additional, although minimal training along with an adequate level of cooperation amongst all parties, particularly by the E9-1-1 service providers. For this reason, time spent working with each PSAP as the new solution is deployed would be kept to a minimum and optional customization for individual PSAPs would be avoided.

All major ILECs have recently demonstrated some level of cooperation in making access to the E9-1-1 network available to support service for VoIP subscribers, and Intrado requests the Commission to be clear as to the responsibilities of the E9-1-1 Service Providers to ensure native delivery of nomadic and fixed VoIP 9-1-1 calls to the appropriate PSAP. As such, Intrado recommends the Commission include in the ruling the role of the E9-1-1 Service Provider, and more specifically we recommend that the E9-1-1 Service Provider is required to do the following:

1. Provide voice access to the selective router;
2. Enable VoIP Service Providers to utilize the infrastructure similarly employed by wireless carriers for the transmission of location and callback information to the PSAPs;

3. Make every reasonable effort to expedite the process of ordering and provisioning trunk translations and/or circuit installations necessary to connect to the Selective Routers.

With respect to access to the selective routers, there are many options. The connections currently offered by the ILECs are directly to the selective router. This leaves open the possibility that some companies that lack the knowledge, processes, and/or rights of certificated carriers will be directly interconnecting to a critical part of the nation's public safety network. Similarly, VoIP Service Providers operating outside the Commission's jurisdiction would be granted access to the E9-1-1 network, thus raising significant homeland security and network integrity concerns. Such concerns are echoed in the recent report published by the Cyber Security Industry Alliance specific to Cyber Security for IP Telephony. "The group said it was imperative to address those issues because a VoIP cyberattack "could lead to serious consequences, such as loss of public access to critical emergency services" like "9-1-1" service."

To address these concerns, Intrado recommends that the Commission make it clear that the network connectivity point that converts the VoIP traffic to analog traffic be configured in a way that allows the E9-1-1 Service Provider to supervise the infrastructure's security. By standardizing on this "meet point" across the country, the rollout of the solution would be accelerated and costs would be contained. It may be prudent to require some level of certification for entities that wish to interconnect to the E9-1-1 network. The combination of an E9-1-1 Service Provider operation of the secure network connectivity point and some minimal level of certification for companies that interconnect with them would ensure the E9-1-1 network is as safe and reliable as today's 9-1-1 infrastructure.

Access to E9-1-1 Network:

Intrado believes that gaining access to the E9-1-1 network comes with responsibilities. Among these are collecting and remitting E9-1-1 fees, providing appropriate contact information for public safety, and establishing and maintaining accurate subscriber data used to process 9-1-1 calls. These requirements are already established in laws passed in each state. These requirements are critical to the ongoing stability and funding of the 9-1-1 system. In order to implement these changes to the network and to those databases on which 9-1-1 is dependent, many entities would incur costs. The collection of 9-1-1 fees would help defray costs incurred, and this role is currently administered by the States. The Commission should continue this

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process, as it has been effective and it should defer the authority to impose fee collection requirements on the VoIP Service Providers to the States.

Finally, Intrado recommends that the Commission work with lawmakers in Congress to afford VoIP Service Providers the same level of liability protection enjoyed by certificated carriers when providing connection to the emergency services network.

Intrado appreciates the opportunity to meet with the Commission and pursuant to Section 1.1206 of the Commission's rules, one copy of this notice is being filed electronically in the above-captioned proceeding.

Very truly yours,

/s/

Mary A. Boyd
Vice President Government & External Affairs